

VIRGINIA: IN THE CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS

JACQUELINE WARREN,

Plaintiff,

v.

CASE NO.: CL 2203530M-00

FOOD LION, LLC
trading as FOOD LION

Defendant.

SERVE: Corporation Service Company
Registered Agent for
FOOD LION, LLC
100 Shockoe Slip, Fl 2
Richmond, VA 23219

FILED
2022 SEP 23 PM 1:11
CIRCUIT COURT FOR THE CITY OF NEWPORT NEWS, VA.
ANGELA F. REASON
CLERK

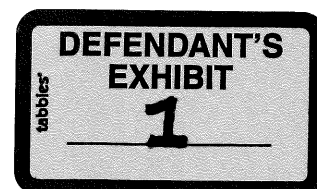
COMPLAINT

COMES NOW the plaintiff, Jacqueline Warren, by counsel, and moves for judgment against the defendant, Food Lion, LLC trading as Food Lion, on the grounds and the amount as hereinafter set forth below:

1. Defendant, Food Lion, LLC is a corporation, that is authorized to conduct business under the laws of the Commonwealth of Virginia with an office and principal place of business in the City of Newport News, Virginia and is the owner of a Food Lion store located at 467 Oriana Road in the City of Newport News, Virginia.

2. As the owner and operator of a grocery store, a place of business to which the general public is invited, Defendant, its agents and employees had a duty to maintain the premises in a reasonably safe condition; to make reasonable inspections to determine whether any latent defects existed; and to warn the public of any such latent defects known to it, its agents and/or employees.

3. Notwithstanding said duties, Defendant, its agents and employees negligently allowed



water and a greasy substance to remain in the floor in an area in which customers traveled while invitees in the said grocery store: although Defendant, its agents and employees knew, or in the exercise of reasonable care should have known that the said defect existed and created a danger to customers in the said area and the said agents and employees of the Defendant took no action to warn customers of the danger or remedy the dangerous condition or post any warnings of the defect.

4. On or about 21st day of October, 2020, Plaintiff was a customer in Defendant's grocery store. Plaintiff was walking in the area in which the latent defect existed, but was unable to see the defect due to the fact that the lighting in the area was dim and there was no warnings by employees or otherwise to warn Plaintiff of the said defect. As a result of Defendant's negligence as aforesaid, Plaintiff slipped on the slippery substance and fell sustaining serious bodily injuries. Subsequent to the fall, Plaintiff was told by an agent or employee of Defendant that the slippery substance was chicken grease.

5. As a direct and proximate result of the fall, Plaintiff has been forced to incur substantial medical and hospital bills in an effort to be cured of her said injuries; has been prevented from transacting her business and personal affairs for a long period of time, has suffered and will continue to suffer severe physical pain of body and mental anguish, and has incurred and will incur in the future hospital, doctors and related bills in an effort to be cured of her said injuries.

6. Pursuant to Virginia Code Section 8.01-382, 1950, as amended, Plaintiff is entitled to receive interest from the date of the accident until such time as the judgment is paid at the prescribed legal rate.

WHEREFORE, Plaintiff demands judgment against the Defendant, in the sum of ONE HUNDRED FIFTY THOUSAND DOLLARS (\$150,000.00), and interest pursuant to Virginia Code Section 8.01-382, 1950, as amended from the date of the accident until such time as judgment is paid

in full at the prevailing legal rate, and for her costs expended in this action.

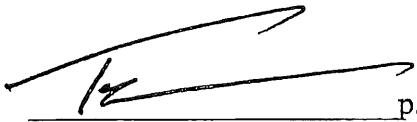
PLAINTIFF DEMANDS TRIAL BY JURY.

Respectfully submitted,

Jacqueline Warren

By: 

Of Counsel

 p.q.

Timothy H. Hankins
TIMOTHY H. HANKINS LAW OFFICE
306 Main Street
Newport News, VA 23601
(757) 595-4000
VSB #20564

COMMONWEALTH OF VIRGINIA



NEWPORT NEWS CIRCUIT COURT
Civil Division
2500 WASHINGTON AVENUE
NEWPORT NEWS VA 23607-4355
(757) 926-8561

Summons

To: CORPORATION SERVICE COMPANY
REGISTERED AGENT
FOOD LION
100 SHOCKOE SLIP, FLOOR 2
RICHMOND VA 23219

Case No. 700CL2203530M-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, September 26, 2022

Clerk of Court: ANGELA F REASON

by

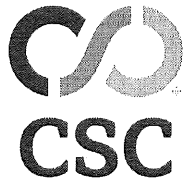
A handwritten signature in cursive script, appearing to read "Angela F Reason", written over a horizontal line.

(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: HANKINS, TIMOTHY H
757-595-4000



Notice of Service of Process

S1C / ALL
Transmittal Number: 25653345
Date Processed: 10/01/2022

Primary Contact: Nykema R Alexander
Delhaize America
2110 Executive Dr
Salisbury, NC 28147-9007

Electronic copy provided to: Wendy Higdon
Sandy Carter

Entity:	Food Lion, LLC Entity ID Number 1965266
Entity Served:	Food Lion , LLC
Title of Action:	Jacqueline Warren vs. Food Lion, LLC Trading As Food Lion
Matter Name/ID:	Jacqueline Warren vs. Food Lion, LLC Trading As Food Lion (13018474)
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Newport News Circuit Court, VA
Case/Reference No:	700CL2203530M-00
Jurisdiction Served:	Virginia
Date Served on CSC:	09/29/2022
Answer or Appearance Due:	21 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	Timothy H. Hankins Law Office 757-595-4000

Information contained on this transmittal form is for record keeping, notification and forwarding the attached document(s). It does not constitute a legal opinion. The recipient is responsible for interpreting the documents and taking appropriate action.

To avoid potential delay, please do not send your response to CSC

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